

COLLEGE OF BUSINESS ADMINISTRATION AND ECONOMICS

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5594 '99 APR 13 NO 16

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

DEAR F.D.A.:

I support the recommendation by the Center for Science in the Public Interest regarding labeling of irradiated foods:

"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Like other labels, irradiation labels are required by FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling.

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer. In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information

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regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

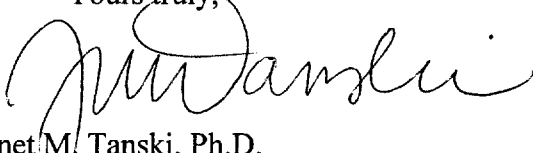
Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

I teach economics at NMSU and in a few of my classes we have discussed the dangers of pesticide poisoning, dioxin in our environment, exports of dangerous chemicals to the Third World, etc. I also am a mother and I am very conscientious about buying safe food for my children; i.e. I purchase organically grown food products whenever possible. I want to be able to believe that my food is safe and nutritious and I WANT TO KNOW IF MY FOOD HAS BEEN IRRADIATED.

My understanding is that: Nuclear irradiation damages the quality of food. Foods that have been exposed to ionizing radiation have second-rate nutrition and "counterfeit freshness." Changes occur in taste, odor, color, and texture. Irradiated fats tend to become rancid. Even at low doses, some irradiated foods lose 20% of sensitive vitamins such as C, E, K, and B complex. Because irradiation breaks down the food's cell walls, accelerated vitamin losses occur during storage. Irradiated foods which are stored for long periods may lose 70-80% of their vitamin content. In Europe, food irradiation has a bad reputation because it has been used to camouflage spoiled seafood. I want to know: "What's wrong with the food that it has to be irradiated?" Nuclear irradiation produces toxic byproducts in the food. Ionizing radiation is so powerful that it knocks electrons out of atoms and creates free radicals. These free radicals react with food components, creating new radiolytic products, some of which are toxic (benzene, formaldehyde, lipid peroxides) and some of which may be unique to irradiated foods. No one knows the long term impact of eating this "modified" food. Studies on animals fed irradiated foods have shown increased tumors, reproductive failures and kidney damage. Chromosomal abnormalities occurred in children from India who were fed irradiated wheat. Nuclear irradiation facilities using radioactive materials are environmental hazards.

Even if not all this is based on exact scientific methods of testing, it is obvious that there is scientific CONCERN about the safety of irradiation. AND I WOULD PREFER TO HAVE THE CHOICE TO CONSUME IRRADIATED FOODS THAN NOT. AND I CERTAINLY CHOOSE NOT. I urge you to KEEP THE LABELS!!

Yours truly,



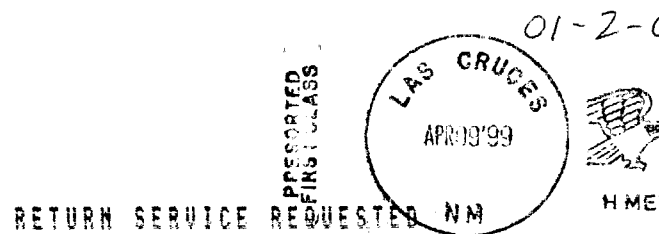
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RETURN SERVICE REQUESTED NM

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